

Patricia M. French  
Senior Attorney



300 Friberg Parkway  
Westborough, Massachusetts 01581  
(508) 836-7394  
(508) 836-7039 (facsimile)  
[pfrench@nisource.com](mailto:pfrench@nisource.com)

September 20, 2006

BY HAND DELIVERY AND E-FILE

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's response to the following Information Request:

**USW-1-33 (SECOND SUPPLEMENTAL RESPONSE)**

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)  
A. John Sullivan (DTE)  
Alexander Cochis, Assistant Attorney General (4 copies)  
Charles Harak, Esq. (UWUA)  
Nicole Horberg Decter, Esq. (USW)  
Service List

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM THE USW  
D.T.E. 06-31

Date: September 20, 2006

Responsible: Stephen H. Bryant, President  
As to Objection: Legal Counsel

**SECOND SUPPLEMENTAL RESPONSE**

USW 1-33: From December 1999 to date, provide all documents in the possession, custody, or control of NiSource, NCSC, or BSG regarding or relating to whether the number of trunk lines utilized by BSG's Springfield Call Center should be, or were, lowered, or conversely, increased.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

Notwithstanding this objection but rather specifically maintaining it, Bay State will state that it is looking to determine whether any such documents exist from the years 2003, 2004, 2005 or 2006 and will supplement this response if any such material is found.

SUPPLEMENTAL  
RESPONSE:

Please see the Company's SUPPLEMENTAL RESPONSE to USW 1-32 for additional information related to this question.

**SECOND SUPPLEMENTAL  
RESPONSE:**

The Company has completed a review of its records and is unable to find any additional information regarding trunk lines for the Springfield Call Center, other than the information previously provided in its responses to USW 1-32.